

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONNA WOOD, *et al.*, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

20 Civ. 2489 (KMW) (GWG)

**STIPULATION**

WHEREAS, on March 23, 2020, Plaintiffs commenced the above-referenced action against Defendant Mike Bloomberg 2020, Inc. (“MB2020” and with Plaintiffs, together the “Parties”) and filed a Class and Collective Action Complaint (Doc. 1); and

WHEREAS, on March 30, 2020, Plaintiffs filed a First Amended Class and Collective Action Complaint (Doc. 29); and

WHEREAS, on April 17, 2020, Plaintiffs filed a Motion for Conditional Certification under the Fair Labor Standards Act, (the “Motion for Conditional Certification”), which is fully briefed and pending a decision by the Court; and

WHEREAS, on May 18, 2020, Plaintiffs filed a Second Amended Class and Collective Action Complaint (“SAC”) (Doc. 86); and

WHEREAS, on June 16, 2020, the Court held an initial case management conference (“ICMC”) where the Parties addressed their respective proposals for discovery, MB2020’s forthcoming motions to dismiss the SAC and strike the class allegations and for a stay of discovery, and the Court ordered that the Parties exchange initial disclosures by August 3, 2020 and propound written discovery requests by August 14, 2020 but did not issue any other discovery deadlines; and

WHEREAS, on June 17, 2020, MB2020 filed a Motion to Dismiss the SAC (the “Motion to Dismiss”), which is fully briefed and pending a decision by the Court; and

WHEREAS, on July 21, 2020, MB2020 filed a Limited Motion to Stay Discovery (the “Motion to Stay”), which is fully briefed and pending a decision by the Court; and

WHEREAS, on August 14, 2020, the Parties propounded document requests and interrogatories (the “Written Discovery”); and

WHEREAS, on August 21, 2010, Plaintiffs objected to responding to MB2020’s Written Discovery other than for eight representative plaintiffs: Donna Wood, Caelan Doherty, Max Goldstein, Bridget Logan, James Kyle Newman, Zia Oram, Alan Robinson, and Alexandra Marie Wheatley-Diaz; and

WHEREAS, on August 24, 2020, the Parties met and conferred regarding Plaintiffs’ objection and Defendants raised certain issues with Plaintiffs’ proposal, including that Plaintiffs’ Written Discovery was not limited to the representative plaintiffs they identified; that Plaintiffs unilaterally selected which individuals would respond to MB2020’s Written Discovery and the group was too small; and that MB2020 could not agree to Plaintiffs’ limited proposal if Plaintiffs intended to move for class certification under Federal Rule of Civil Procedure (“Rule 23”) prior to MB2020 obtaining discovery from a broader group of the putative class.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties:

1. In addition to the eight representative plaintiffs identified above, Plaintiffs shall respond to MB2020’s Written Discovery for ten named plaintiffs and/or opt-in plaintiffs selected by MB2020. MB2020 will identify the ten individuals to Plaintiffs on or before September 9, 2020.

2. The Parties will serve objections and responses to Written Discovery by October 5, 2020.

3. The Parties agree that during this initial round of discovery, Plaintiffs' objections and responses will be limited to the eight representative plaintiffs identified above and the ten additional individuals selected by MB2020. To the extent any of Plaintiffs' Written Discovery requires responses or production concerning specific individual named plaintiffs or members of the putative Class or Collective, MB2020's objections and responses to such specific requests will be limited to the same 18 individuals. The Parties agree that MB2020's objections and responses will not, to the extent not otherwise objected to, be limited for Plaintiffs' Written Discovery concerning, among other things, and any general policy and practice documents, provided such documents are applicable to the 18 individuals. The Parties reserve all other objections.

4. Plaintiffs shall not file a Rule 23 motion for class certification prior to the Court ruling on MB2020's Motion to Stay and Motion to Dismiss, or before the Parties have an opportunity to engage in discovery concerning a broader group of the putative class, whichever is later.

Dated: New York, New York  
September 1, 2020

By: /s/ Sally J. Abrahamson  
Sally J. Abrahamson

By: /s/ Elise M. Bloom  
Elise M. Bloom

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